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11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 ROBERT BOSCH LLC,
15 Plaintiff,

16 v.

17 UNIPOINT ELECTRIC MFG. CO., LTD., and
18 UNIPOINT NORTH AMERICA,
19 Defendants.

Case No. 2:10-cv-1932

COMPLAINT

[JURY TRIAL DEMANDED]

20 Plaintiff Robert Bosch LLC (“Bosch”), through its attorneys, for its complaint against
21 Defendant Unipoint Electric Mfg. Co., Ltd. and Defendant Unipoint North America
22 (collectively, “Defendants”), avers as follows:

23 1. This action arises under the patent laws of the United States, Title 35 of the
24 United States Code (for example, 35 U.S.C. §§ 271, 281, 283, 284, and 285) as hereinafter more
25 fully appears. This Court has jurisdiction over the subject matter of the action pursuant to 28
26 U.S.C. §§ 1331 and 1338.
27

1 2. On April 29, 2003, United States Letters Patent No. 6,553,607 (attached as
2 Exhibit A) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
3 of those Letters Patent.

4 3. Defendants have infringed and still are infringing those Letters Patent directly and
5 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
6 patented invention, such as the 71 Series wiper blade products, and will continue to do so unless
7 enjoined by this Court.

8 4. On September 2, 2003, United States Letters Patent No. 6,611,988 (attached as
9 Exhibit B) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
10 of those Letters Patent.

11 5. Defendants have infringed and still are infringing those Letters Patent directly and
12 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
13 patented invention, such as the 71 Series wiper blade products, and will continue to do so unless
14 enjoined by this Court.

15 6. On September 20, 2005, United States Letters Patent No. 6,944,905 (attached as
16 Exhibit C) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
17 of those Letters Patent.

18 7. Defendants have infringed and still are infringing those Letters Patent directly and
19 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
20 patented invention, such as the 71 Series and 6C Series wiper blade products, and will continue
21 to do so unless enjoined by this Court.

22 8. On November 13, 2007, United States Letters Patent No. 7,293,321 (attached as
23 Exhibit D) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
24 of those Letters Patent.

1 9. Defendants have infringed and still are infringing those Letters Patent directly and
2 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
3 patented invention, such as the 6C Series wiper blade products, and will continue to do so unless
4 enjoined by this Court.

5 10. On April 28, 2009, United States Letters Patent No. 7,523,520 (attached as
6 Exhibit E) were duly and legally issued for an invention in a wiper blade. Plaintiff is the owner
7 of those Letters Patent.
8

9 11. Defendants have infringed and still are infringing those Letters Patent directly and
10 indirectly by making, importing, offering for sale, using, and selling wiper blades embodying the
11 patented invention, such as the 6C Series wiper blade products, and will continue to do so unless
12 enjoined by this Court.

13 12. Defendants' infringement has caused and will continue to cause damage and
14 irreparable harm to Bosch until enjoined by this Court.
15

16 WHEREFORE, Plaintiff demands an injunction against continued infringement, an
17 award of damages, an assessment of interest and costs against Defendants, and such other relief
18 as the Court may find just and proper.
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JURY DEMAND

Plaintiff demands a trial by jury.

LIONEL SAWYER & COLLINS

By: /s/ Cam Ferenbach

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